

Applicant: DORI, Dov
Serial No.: 09/808,781
Attorney Docket No.: P-7481-US

REMARKS

Applicant has carefully studied the Office Action. This Amendment is intended to be fully responsive to all points of rejection and objection raised by the Examiner and is believed to place the application in condition for allowance. Favorable reconsideration and allowance of the application are respectfully requested.

Status of the Claims

Claims 1-40 are pending in the Application. Claims 1-3, 5, 8, 12, 13, 15-18, 20, 24, 25, and 30-34 have been amended. New claims 35-40 have been added.

Voluntary Amendments and New Claims

Applicant has amended claims 1-3, 5, 8, 12, 13, 15-18, 20, 24, 25, and 30-34 to clarify what the Applicant regards as the invention. In addition, new claims 35-40 have been added to further define what Applicant regards as the invention. No new matter has been added by this Amendment.

Applicant respectfully submits that this Amendment does not narrow the scope of the claims and is not being made for reasons of patentability. Therefore, Applicant respectfully submits that the amended claims are not subject to the complete bar against the use of the Doctrine of Equivalents as outlined in *Festo Corporation v. Shoketsu Kinzoku Kogyo Kabushiki Co., Ltd.*

Oath/Declaration

The Examiner noted that a Declaration was filed and received with the appropriate fee, but the document is missing from the file and the Office is investigating this matter. The Examiner suggested that Applicant resubmit the Declaration.

Accordingly, Applicant submits herewith a signed Declaration for this Application. The Examiner is requested to place this signed Declaration in the appropriate part in the file.

Applicant: DORI, Dov
Serial No.: 09/808,781
Attorney Docket No.: P-7481-US

Drawings

The Examiner objected to informalities in drawings sheet number 27. Enclosed is a replacement drawings sheet number 27, which replaces previous drawings sheet number 27. The replacement sheet includes FIG. 31A. As suggested by the Examiner in the Office Action, the replacement sheet includes a designation "FIG. 31A", and the two boxes labeled "FIG. 31A" and "FIG. 31B" have been removed.

The Examiner also objected to informalities in drawings sheet number 35. Enclosed is a replacement drawings sheet number 35, which replaces previous drawings sheet number 35. The replacement sheet includes FIG. 38. As suggested by the Examiner in the Office Action, the replacement sheet includes a designation "FIG. 38".

In view of the above, it is respectfully requested that the objections to the drawings be withdrawn.

Specification

The Examiner objected to various informalities in the specification, and suggested that the specification be revised carefully in order to correct terms which are not clear, concise or exact. The informalities in the specification included unintentional typographical and editorial errors, for example, reference to "Nalue" instead of "Value", reference to element 240 instead of element 340, reference to "Notary Sealed" instead of the term "Notary Seal", and similar informalities.

Applicant has amended the specification to cure the informalities pointed out by the Examiner. No new matter has been added.

In view of the above, it is respectfully requested that the objections to the specification be withdrawn.

Claim Objections

The Examiner objected to various informalities in claims 2, 3, 8, 17, and 33.

Applicant: DORI, Dov
Serial No.: 09/808,781
Attorney Docket No.: P-7481-US

Specifically, with regard to claims 2 and 17, the Examiner suggested that a comma be added after the word "notation". Accordingly, Applicant has amended claims 2 and 17 by adding a comma after the word "notation". No new matter has been added.

With regard to claim 3, the Examiner suggested that claim 3 depend from claim 2 rather than from claim 1, for providing proper antecedent basis. Accordingly, Applicant has amended claim 3, such that amended claim 3 depends from claim 2 rather than from claim 1. No new matter has been added.

With regard to claim 8, the Examiner suggested amending "wherein the generating" to read "wherein generating". Accordingly, Applicant has amended claim 8 to read "wherein generating" instead of "wherein the generating". No new matter has been added.

With regard to claim 33, the Examiner suggested that this claim be amended to end with a period. Accordingly, Applicant has amended claim 33 such that, inter alia, amended claim 33 ends with a period. No new matter has been added.

Applicant respectfully submits that amended claims 2, 3, 8, 17, and 33 meet all formal requirements of the rules and guidelines.

In view of the above, it is respectfully requested that the objections to claims 2, 3, 8, 17, and 33 due to informalities be withdrawn.

Claim Rejections Under 35 USC §112, First Paragraph

The Examiner rejected claims 4, 5, 13, 19-21 and 30-32 under 35 USC §112, first paragraph, as failing to comply with the written description requirement.

Specifically, the Examiner contended that claims 4, 5, 13, 19-21 and 30-32 recite limitations involving the Context Free Grammar (CFG) and/or Production Rules based thereon, whereas Appendix B contains Production Rules for a CFG which are incomplete and do not correspond with the drawings or specification. The Examiner suggested that Applicant make the appropriate corrections.

Accordingly, Applicant has amended Appendix B to cure several unintentional typographical and editorial errors, as detailed in the foregoing Amendment to the

Applicant: DORI, Dov
Serial No.: 09/808,781
Attorney Docket No.: P-7481-US

Specification, thereby curing minor inconsistencies between the production rules of Appendix B and the specification and the drawings.

Applicant respectfully submits that the amendments to the production rules of Appendix B add no new matter to the application. These amendments correspond, in a production rule format, to information and elements already conveyed in the specification and/or drawings.

Specifically, Applicant has amended the *Diagram-id* production rule in Appendix B, which now resolves to terminal symbols represented by *Diagram-ids* as **SD1.12.4** or **SD13**, the latter being in accordance with FIG. 12 which includes **SD1** with a label 160 at the top left corner. The amended *Diagram-id* production rule properly corresponds to element 230 of FIG. 12.

Applicant has amended Appendix B by inserting a *State-order-sentence* production rule, which may resolve, for example, to the sentence “**Person** is initially **single**.”, which appears in FIGS. 1 and 3-9.

Applicant has amended the *Thing-list* production rule in Appendix B, to read:

Thing-list → *Thing-list* ((/comma)[?] and more)[?] | *Object-list* | *Process-list* | *Process-and-Object-list* | *Object-and-Process-list*

and since Appendix B already includes the following production rule:

Exhibition-sentence → *Thing-name* exhibits *Thing-list*

the production rules may derive:

Thing-name exhibits *Thing-list* ((/comma)[?] and more)[?]

which may yield, for example, the sentence “**Person** exhibits **Marital Status** and more.”, which appears in FIG. 2 as element 204.

Applicant has amended the *Detailing-sentence* production rule in Appendix B, such that it no longer includes “*Object-detailing-sentence*” and “*State-detailing-sentence*”.

Applicant respectfully submits that each of the elements recited in claims 4, 5, 13, 19-21 and 30-32, as amended, has ample support in the specification and/or drawings.

In view of the foregoing Amendment, the Examiner’s rejection of claims 4, 5, 13, 19-21 and 30-32 under 35 USC §112, first paragraph, as failing to comply with the written

Applicant: DORI, Dov
Serial No.: 09/808,781
Attorney Docket No.: P-7481-US

description requirement, should be withdrawn. The Examiner is thus requested to withdraw the rejection.

Claim Rejections Under 35 USC §112, Second Paragraph

The Examiner rejected claims 3, 5, 13, 18, 20, 21, 25, 31, and 32 under 35 USC § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention.

Specifically, with regard to claims 3, 18, and 31, the Examiner contended that it is unclear how broad the definition of “Object Process Methodology” can be correctly interpreted.

Claims 3, 18, and 31 have been amended along the line suggested by the Examiner, and they no longer include the term “Object Process Methodology”. In view of this amendment, Applicant respectfully requests that the rejection of claims 3, 18, and 31 under 35 USC §112, second paragraph, be withdrawn.

With regard to claims 5, 20, and 21, the Examiner contended that it is unclear how a context-free grammar expression can be generated from a context-free production rule such that it is consistent with a natural language.

Claims 5 and 20 have been amended to clarify that the production rules are consistent with at least a subset of a natural language. Applicant respectfully submits that the rejection of claims 5, 20, and 21 under 35 USC §112, second paragraph, has been overcome by this amendment and respectfully requests that the rejection be withdrawn.

With regard to claims 13 and 32, the Examiner contended that it is unclear how a textual description can be generated using production rules of a context-free grammar for a natural language.

Claims 13 and 32 have been amended to clarify that they relate to at least a subset of a natural language. Applicant respectfully submits that the rejection of claims 13 and 32 under 35 USC §112, second paragraph, has been overcome by this amendment and respectfully requests that the rejection be withdrawn.

Applicant: DORI, Dov
Serial No.: 09/808,781
Attorney Docket No.: P-7481-US

With regard to claim 25, the Examiner contended that it is unclear what is meant by “generating” textual input, as the textual input is being received as input.

Claim 25 has been amended to clarify that it relates to “receiving” the textual input instead of to “generating” the textual input. Applicant respectfully submits that the rejection of claim 25 under 35 USC §112, second paragraph, has been overcome by this amendment and respectfully requests that the rejection be withdrawn.

Claim Interpretation

The Examiner made certain claim interpretations with regard to certain elements recited in claims 3-5, 13, 18-21, 25, and 30-32.

Without specifically relating to any of the interpretations made by the Examiner of certain elements recited in claims 3-5, 13, 18-21, 25, and 30-32, Applicant respectfully submits that the interpretations made by the Examiner have no bearing on this Amendment and do not relate to any of the issues discussed herein. Therefore, although Applicant has not analyzed the appropriateness of the claim interpretations made by the Examiner, Applicant believes that this Amendment is fully responsive to all issues raised by the Examiner. Furthermore, Applicant reserves all rights in other possible interpretations of the elements recited in claims 3-5, 13, 18-21, 25, and 30-32, and/or other elements of these or other claims.

Claim Rejections Under 35 USC §102(b)

The Examiner rejected claims 1-11, 14 and 33 under 35 USC §102(b) as being anticipated by United States Patent Number 5,187,788 to Marmelstein (“Marmelstein”).

Marmelstein describes an automatic code generation tool for the Ada programming language, allowing a programmer to create a graphical representation of an initial program design akin to a flowchart, and producing Ada code based on the graphical representation.

As is well established, in order for a claim to be anticipated by the prior art, each and every element and feature of the claim must be included in a single prior art document.

Applicant: DORI, Dov
Serial No.: 09/808,781
Attorney Docket No.: P-7481-US

Amended independent claim 1 recites, *inter alia*, "identifying a graphical pattern corresponding to a combination of one or more processes and one or more objects in said model diagram". Marmelstein does not disclose, teach or suggest at least these features of claim 1.

Amended independent claim 33 recites, *inter alia*, "identify a graphical pattern corresponding to a combination of one or more processes and one or more objects of said model diagram". Marmelstein does not disclose, teach or suggest at least these features of claim 33.

In view of the above, Marmelstein does not anticipate either of independent claims 1 and 33, as amended.

Claims 2-11 and 14 are dependent from amended independent claim 1, and include all the features of amended independent claim 1 as well as additional distinguishing features. Therefore, it is respectfully submitted that the novelty of claims 2-11 and 14 follows directly from the novelty of amended independent claim 1 and therefore, none of claims 2-11 and 14 is anticipated by Marmelstein.

In view of the above, Applicant respectfully requests that the rejection of claims 1-11, 14 and 33 under 35 USC §102(b) as being anticipated by Marmelstein be withdrawn.

The Examiner rejected claims 16-29 and 34 under 35 USC §102(b) as being anticipated by United States Patent Number 4,315,315 to Kossiakoff ("Kossiakoff").

Kossiakoff describes a process for automatically producing a computer program in machine assembly language directly from a two-dimensional network representing the flow of data and control logic.

As is well established, in order for a claim to be anticipated by the prior art, each and every element and feature of the claim must be included in a single prior art document.

Amended independent claim 16 recites, *inter alia*, "identifying at least a portion of said textual description as being convertible to a graphical pattern corresponding to a combination of one or more processes and one or more objects of said model". Kossiakoff does not disclose, teach or suggest at least this feature of claim 16.

Applicant: DORI, Dov
Serial No.: 09/808,781
Attorney Docket No.: P-7481-US

Amended independent claim 34 recites, *inter alia*, “identify at least a portion of said textual description as being convertible to a graphical pattern corresponding to a combination of one or more processes and one or more objects of said model”. Kossiakoff does not disclose, teach or suggest at least this feature of claim 34.

In view of the above, Kossiakoff does not anticipate either of independent claims 16 and 34, as amended.

Claims 17-29 are dependent from amended independent claim 16, and include all the features of amended independent claim 16 as well as additional distinguishing features. Therefore, it is respectfully submitted that the novelty of claims 17-29 follows directly from the novelty of amended independent claim 16 and therefore, none of claims 17-29 is anticipated by Kossiakoff.

In view of the above, Applicant respectfully requests that the rejection of claims 16-29 and 34 under 35 USC §102(b) as being anticipated by Kossiakoff be withdrawn.

Furthermore, Applicant respectfully submits that the above-mentioned distinctions of claims 1-11, 14, 16-29, 33, and 34, as amended, are significant and would not have been obvious at the time the invention was made to a person having ordinary skill in the art in view of any of the cited references on record, including Marmelstein, Kossiakoff, United States Patent Number 5,321,607 to Fukumochi (“Fukumochi”), and any combinations of these references. Therefore, Applicant respectfully submits that claims 1-11, 14, 16-29, 33, and 34, as amended, meet the patentability requirements of 35 USC §103.

Claim Rejections Under 35 USC §103(a)

The Examiner rejected claims 12 and 13 under 35 USC §103(a) as being unpatentable over Marmelstein in view of Fukumochi.

Marmelstein describes an automatic code generation tool for the Ada programming language, allowing a programmer to create a graphical representation of an initial program design akin to a flowchart, and producing Ada code based on the graphical representation.

Applicant: DORI, Dov
Serial No.: 09/808,781
Attorney Docket No.: P-7481-US

Fukumochi describes a machine for automatic translation between two natural languages.

According to M.P.E.P. §2142, In order to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art references must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure.

Without conceding the appropriateness of the combination, Applicant respectfully submits that the combination of Marmelstein and Fukumochi does not meet the requirements of an obviousness rejection as applied to claims 12 and 13, in that the combination at least fails to teach or suggest all the elements of these claims.

Claims 12 and 13 depend from amended independent claim 1, which recites, *inter alia*, "identifying a graphical pattern corresponding to a combination of one or more processes and one or more objects in said model diagram". Marmelstein and/or Fukumochi, alone or in combination, do not disclose, teach or suggest at least this feature the claimed invention.

In addition, Applicant submits that it is improper to consider Marmelstein as being relevant prior art. It is well established that "In order to rely on a reference as a basis for rejection of an applicant's invention, the reference must either be in the field of applicant's endeavor or, if not, then be reasonably pertinent to the particular problem with which the inventor was considered." (M.P.E.P. 2100-122; See also *In Re Clay*, 966 F.2d 656, 658-59 (Fed. Cir. 1992)). Generally, the claimed invention is directed to, *inter alia*, a method and device for modeling a system, for example, a social system, a biological system, a physical system, or an informatical system. In contrast, Marmelstein is directed to an automatic code generation tool for the Ada programming language. The characteristics of the field of modeling systems are significantly different from those of the field of automatic code

Applicant: DORI, Dov
Serial No.: 09/808,781
Attorney Docket No.: P-7481-US

generation. Therefore, Marmelstein may not be properly used as relevant prior art to render the claimed invention obvious.

Additionally, Applicant submits that it is improper to consider Fukumochi as being relevant prior art. As discussed above, the claimed invention is directed to, *inter alia*, a method and device for modeling a system, for example, a social system, a biological system, a physical system, or an informatical system. In contrast, Fukumochi is directed to an automatic translation machine for translation between two natural languages, and is clearly unrelated to modeling or to diagrams having graphical elements. The characteristics of the field of modeling systems are significantly different from those of the field of automatic translation between natural languages. Therefore, Fukumochi may not be properly used as relevant prior art to render the claimed invention obvious.

Furthermore, Applicant submits that it is improper to combine Marmelstein and Fukumochi, since Marmelstein and Fukumochi are not in the same field. As discussed above, Marmelstein is directed to an automatic code generation tool for the Ada programming language, whereas Fukumochi is directed to an automatic translation machine for translation between two natural languages. The characteristics of the field of code generation are significantly different from those of the field of translation between natural languages. Applicant respectfully submits that at the time the invention was made, it would not have been obvious to combine the teaching of Marmelstein with the teaching of Fukumochi, since these two references belong to different, non-related fields. Therefore, Marmelstein and Fukumochi may not be properly used in combination to render the claimed invention obvious.

Applicant further submits that the first of the above-mentioned criteria for *prima facie* obviousness is not met, as neither Marmelstein nor Fukumochi show a suggestion or motivation to modify the references or to combine references teachings. The machine of Marmelstein creates Ada code from a graphical representation prepared by a programmer operating a specific design tool, whereas the machine of Fukumochi analyses an input text and produces an output text based on a set of rules. The input, the output, and the operational mechanism of the code generation machine of Marmelstein are significantly

Applicant: DORI, Dov
Serial No.: 09/808,781
Attorney Docket No.: P-7481-US

different from the input, the output, and the operational mechanism of the translation machine of Fukumochi, respectively. Therefore, at the time the invention was made, there was no motivation or suggestion in the art to combine the code generator of Marmelstein with the natural language translator of Fukumochi.

Applicant further submits that the second of the above-mentioned criteria for prima facie obviousness is not met, as, at the time the invention was made, there was no reasonable expectation of success from the combination of Marmelstein and Fukumochi. Applicant submits that the combination of the code generator of Marmelstein with the natural language translator of Fukumochi would yield an inoperable device. As discussed, the input, the output, and the operational mechanism of the code generation machine of Marmelstein are significantly different from the input, the output, and the operational mechanism of the translation machine of Fukumochi, respectively. The translation machine of Fukumochi analyses a text to produce a text, whereas the code generation machine of Marmelstein produces an Ada code based on a graphical flow-chart. The translation machine of Fukumochi cannot analyze a graphical flow-chart and cannot produce an Ada code, whereas the code generation machine of Marmelstein cannot analyze a text and cannot produce a natural language text. In view of the above, at the time the invention was made, it would not have been possible for a person of ordinary skill in the art to combine the translation machine of Fukumochi with the code generation machine of Marmelstein, and there was no reasonable expectation of success from the combination of Marmelstein and Fukumochi.

In view of the above, Applicant respectfully requests that the rejection of claims 12 and 13 under 35 USC §103(a) as being unpatentable over Marmelstein in view of Fukumochi be withdrawn.

The Examiner rejected claim 15 under 35 USC §103(a) as being unpatentable over Marmelstein in view of Kossiakoff.

Applicant: DORI, Dov
Serial No.: 09/808,781
Attorney Docket No.: P-7481-US

Kossiakoff describes a process for automatically producing a computer program in machine assembly language from a two-dimensional network representing the flow of data and control logic.

Without conceding the appropriateness of the combination, Applicant respectfully submits that the combination of Marmelstein and Kossiakoff does not meet the requirements of an obviousness rejection as applied to claim 15, in that the combination at least fails to teach or suggest all the elements of this claim.

Claim 15 depends from amended independent claim 1, which recites, *inter alia*, "identifying a graphical pattern corresponding to a combination of one or more processes and one or more object in said model diagram". Marmelstein and/or Kossiakoff, alone or in combination, do not disclose, teach or suggest at least this feature of the claimed invention.

Applicant submits that it is improper to consider Marmelstein as being relevant prior art, at least for the reasons discussed above with regard to the patentability of claims 12 and 13.

Additionally, Applicant submits that it is improper to consider Kossiakoff as being relevant prior art. As discussed above, the claimed invention is directed to, *inter alia*, a method and device for modeling a system, for example, a social system, a biological system, a physical system, or an informatical system. In contrast, Kossiakoff is directed to a machine for producing assembly language code from a graphical circuit. The characteristics of the field of modeling systems are significantly different from those of the field of assembly code production. Therefore, Kossiakoff may not be properly used as relevant prior art to render the claimed invention obvious.

Applicant further submits that the first of the above-mentioned criteria for *prima facie* obviousness is not met, as neither Marmelstein nor Kossiakoff show a suggestion or motivation to modify the references or to combine references teachings. The machine of Marmelstein creates Ada code from a graphical representation prepared by a programmer operating a specific design tool, whereas the machine of Kossiakoff analyses a circuit to produce assembly code. The input, the output, and the operational mechanism of the Ada

Applicant: DORI, Dov
Serial No.: 09/808,781
Attorney Docket No.: P-7481-US

code generation machine of Marmelstein are significantly different from the input, the output, and the operational mechanism of the assembly production machine of Kossiakoff, respectively. Therefore, at the time the invention was made, there was no motivation or suggestion in the art to combine the machine of Marmelstein with the machine of Kossiakoff.

Applicant further submits that the second of the above-mentioned criteria for *prima facie* obviousness is not met, as, at the time the invention was made, there was no reasonable expectation of success from the combination of Marmelstein and Kossiakoff. Applicant submits that the combination of the machine of Marmelstein with the machine of Kossiakoff would yield an inoperable device. The machine of Marmelstein receives as input, and processes, only a certain, unique type of graphical representation, not compatible with the type of graphical representation that the machine of Kossiakoff receives as input and processes, and vice versa. In view of the above, at the time the invention was made, it would not have been possible for a person of ordinary skill in the art to combine the machine of Kossiakoff with the machine of Marmelstein, and there was no reasonable expectation of success from the combination of Kossiakoff and Marmelstein.

In view of the above, Applicant respectfully requests that the rejection of claim 15 under 35 USC §103(a) as being unpatentable over Marmelstein in view of Kossiakoff be withdrawn.

The Examiner rejected claim 25 under 35 USC §103(a) as being unpatentable over Kossiakoff in view of Marmelstein.

Without conceding the appropriateness of the combination, Applicant respectfully submits that the combination of Marmelstein and Kossiakoff does not meet the requirements of an obviousness rejection as applied to claim 25, in that the combination at least fails to teach or suggest all the elements of this claim.

Claim 25 depends from amended independent claim 16, which recites, *inter alia*, "identifying at least a portion of said textual description as being convertible to a graphical

Applicant: DORJ, Dov
Serial No.: 09/808,781
Attorney Docket No.: P-7481-US

pattern corresponding to a combination of one or more processes and one or more objects of said model". Marmelstein and/or Kossiakoff, alone or in combination, do not disclose, teach or suggest at least this feature the claimed invention.

Applicant submits that it is improper to consider Marmelstein as being relevant prior art, at least for the reasons discussed above with regard to the patentability of claims 12 and 13.

Applicant further submits that it is improper to consider Kossiakoff as being relevant prior art, at least for the reasons discussed above with regard to the patentability of claim 15.

Additionally, Applicant submits that the first of the above-mentioned criteria for *prima facie* obviousness is not met, as neither Marmelstein nor Kossiakoff show a suggestion or motivation to modify the references or to combine references teachings, as discussed above with regard to the patentability of claim 15.

Applicant further submits that the second of the above-mentioned criteria for *prima facie* obviousness is not met, as, at the time the invention was made, there was no reasonable expectation of success from the combination of Marmelstein and Kossiakoff, as discussed above with regard to the patentability of claim 15.

In view of the above, Applicant respectfully requests that the rejection of claim 25 under 35 USC §103(a) as being unpatentable over Marmelstein in view of Kossiakoff be withdrawn.

The Examiner rejected claims 30-32 under 35 USC §103(a) as being unpatentable over Marmelstein in view of Fukumochi.

Without conceding the appropriateness of the combination, Applicant respectfully submits that the combination of Marmelstein and Fukumochi does not meet the requirements of an obviousness rejection as applied to claims 30-32, in that the combination at least fails to teach or suggest all the elements of these claims.

Amended independent claim 30 recites, *inter alia*, "identifying a graphical pattern corresponding to a combination of one or more processes and one or more objects".

Applicant: DORI, Dov
Serial No.: 09/808,781
Attorney Docket No.: P-7481-US

Marmelstein and/or Fukumochi, alone or in combination, do not disclose, teach or suggest at least this feature the claimed invention. Therefore, the combination of Marmelstein and Fukumochi does not render claim 30 obvious.

In addition, Applicant submits that it is improper to consider Marmelstein and/or Fukumochi as being relevant prior art, at least for the reasons discussed above with regard to the patentability of claims 12 and 13.

Furthermore, Applicant submits that it is improper to combine Marmelstein and Fukumochi, since Marmelstein and Fukumochi are not in the same field, at least for the reasons discussed above with regard to the patentability of claims 12 and 13.

Additionally, Applicant submits that the first of the above-mentioned criteria for *prima facie* obviousness is not met, as neither Marmelstein nor Fukumochi show a suggestion or motivation to modify the references or to combine references teachings, as discussed above with regard to the patentability of claims 12 and 13.

Applicant further submits that the second of the above-mentioned criteria for *prima facie* obviousness is not met, as, at the time the invention was made, there was no reasonable expectation of success from the combination of Marmelstein and Fukumochi, as discussed above with regard to the patentability of claims 12 and 13.

Claims 31-32 are dependent from amended independent claim 30, and include all the features of amended independent claim 30 as well as additional distinguishing features. Therefore, it is respectfully submitted that the patentability of claims 31-32 follow directly from the novelty of amended independent claim 30.

In view of the above, Applicant respectfully requests that the rejection of claims 30-32 under 35 USC §103(a) as being unpatentable over Marmelstein in view of Fukumochi be withdrawn.

Conclusion

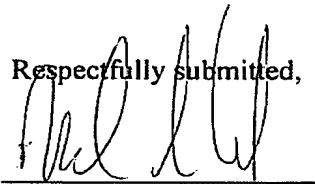
In view of the foregoing amendment and remarks, and for at least the reasons discussed above, Applicant respectfully submits that claims 1-40 are deemed to be allowable. Their favorable reconsideration and allowance are respectfully requested.

Applicant: DORI, Dov
Serial No.: 09/808,781
Attorney Docket No.: P-7481-US

Should the Examiner have any question or comment as to the form, content or entry of this paper, the Examiner is requested to contact the undersigned at the telephone number below. Similarly, if there are any further issues yet to be resolved to advance the prosecution of this application to issue, the Examiner is requested to telephone the undersigned counsel.

No fees are believed to be due. However, if any fees are due, please charge any such fees to deposit account No. 05-0649.

Respectfully submitted,



Mark S. Cohen
Attorney for Applicant
Registration No. 42,425

Dated: December 27, 2004

Eitan, Pearl, Latzer & Cohen Zedek, LLP.
10 Rockefeller Plaza, Suite 1001
New York, New York 10020
Tel: (212) 632-3480
Fax: (212) 632-3489

Applicant: DORI, Dov
Serial No.: 09/808,781
Attorney Docket No.: P-7481-US

Amendments to the Drawings:

Enclosed is replacement drawings sheet number 12, which replaces previous drawing sheet number 12. The replacement sheet includes FIG. 12. Further to a comment by the Examiner in the Office Action, FIG. 12 was amended such that the word "affects" in element 234 appears in non-bold font instead of the previous bold font. No new matter has been added.

Further enclosed is replacement drawings sheet number 19, which replaces previous drawing sheet number 19. The replacement sheet includes FIG. 21A. Further to a comment by the Examiner in the Office Action, for purposes of clarity, in this replacement sheet a small horizontal space was inserted between the "/" character and the "Value" word, in two places, to clarify that the combined term is "/Value" and not "Nalue". Additionally, further to a comment by the Examiner in the Office Action, in this replacement sheet, the line to balloon 1 now originates from the state "closed" within the object "Shape", and not from the rectangle of "Shape" as in the previous drawings sheet. No new matter has been added.

Further enclosed is replacement drawings sheet number 20, which replaces previous drawing sheet number 20. The replacement sheet includes FIG. 21B. Further to a comment by the Examiner in the Office Action, in this replacement sheet, the term "/Value" appears instead of the previous word "Nalue". It is noted that for purposes of clarity, a small horizontal space was inserted between the "/" character and the "Value" word, to clarify that the combined term is "/Value" and not "Nalue". No new matter has been added.

Further enclosed is replacement drawings sheet number 24, which replaces previous drawing sheet number 24. The replacement sheet includes FIGS. 25, 26, and 27. Further to a comment by the Examiner in the Office Action, FIG. 26 was amended such that the "s" element has a bold border instead of the previous non-bold border. No new matter has been added.

Applicant: DORI, Dov
Serial No.: 09/808,781
Attorney Docket No.: P-7481-US

Further enclosed is replacement drawings sheet number 27, which replaces previous drawing sheet number 27. The replacement sheet includes FIG. 31A. As suggested by the Examiner in the Office Action, the replacement sheet includes a designation "FIG. 31A", and the two boxes labeled "FIG. 31A" and "FIG. 31B" have been removed. No new matter has been added.

Further enclosed is replacement drawings sheet number 35, which replaces previous drawing sheet number 35. The replacement sheet includes FIG. 38. As suggested by the Examiner in the Office Action, the replacement sheet includes a designation "FIG. 38". No new matter has been added.